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REC'D TN  
REGULATORY AUTH.  
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EXECUTIVE DIRECTOR

February 10, 2000

Mr. David Waddell  
Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Re: Arbitration of an Interconnection Agreement Between BellSouth and  
U.S. LEC  
Docket No. 00-00053

Dear David:


Please accept for filing the attached Agreed Motion for an Extension of Time for US LEC of Tennessee Inc. ("US LEC") to respond to the Petition of BellSouth Telecommunications, Inc. ("BellSouth") for arbitration of unresolved issues in the negotiation of their interconnection agreement.

Guy Hicks, counsel for BellSouth, has informed me that BellSouth agrees to this Motion and, if requested, will file a letter to that effect with the TRA.

Please bring this matter to the attention of the Directors/Arbitrators. If possible, US LEC requests that this agreed motion be placed before the TRA at the agency's next meeting on February 15, 2000.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:   
Henry Walker

HW/nl

cc: Guy Hicks, Counsel for BellSouth

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2-14-00

**BEFORE THE  
TENNESSEE REGULATORY AUTHORITY**

REC'D TN  
REGULATORY AUTH.

**In re:**

**Petition for Arbitration of an Interconnection  
Agreement Between BellSouth Telecommunications,  
Inc. and US LEC of Tennessee Inc. Pursuant to the  
Telecommunications Act of 1996**

**Docket No. 00-00053**

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CLERK OF THE  
EXECUTIVE SECRETARY

**AGREED MOTION FOR EXTENSION OF TIME**

US LEC of Tennessee Inc. ("US LEC"), by its undersigned counsel, hereby requests an extension of time of ninety (90) days to respond to the Petition of BellSouth Telecommunications, Inc. ("BellSouth") for arbitration of unresolved issues in the negotiation of an interconnection agreement between US LEC and BellSouth. Counsel for BellSouth has informed counsel for US LEC that BellSouth agrees with this request.

In accordance with Section 252(b)(3) of the Telecommunications Act, 47 U.S.C. § 252(b)(3), a response to BellSouth's arbitration Petition must be filed with the Tennessee Regulatory Authority ("Authority") by February 19, 2000. Concurrent with this request, the parties also consent to an extension of the Authority's deadline, contained in Section 252(b)(4)(C) of the Telecommunications Act, 47 U.S.C. § 252(b)(4)(C), for the resolution of disputed interconnection agreement issues by ninety (90) days.

The Authority currently is in the final stages of several proceedings relating to the arbitration of unresolved issues in the negotiation of interconnection agreements between BellSouth and certain other carriers. Many of the issues addressed in the Authority's recent arbitration proceedings are similar to those that US LEC and BellSouth thus far have been unable to resolve in the negotiation of their interconnection agreement. In order to avoid having the

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Authority re-arbitrate these same issues, the Parties are interested in awaiting the final approval of interconnection agreements resulting from the Authority's other arbitration proceedings. Pursuant to Section 252(i) of the Telecommunication Act, 47 U.S.C. § 252(i), US LEC is considering opting into such future agreements, to the extent applicable. The requested extension of time will permit the Parties to review the agreements resulting from other arbitration proceedings, and avoid duplicative litigation of similar issues.

WHEREFORE, US LEC respectfully requests that Authority extend the deadline for filing a response to BellSouth's arbitration Petition by ninety (90) days and extend the Authority's deadline for the resolution of disputed interconnection agreement issues by an equal amount. In light of the February 19, 2000, statutory deadline for filing a response to BellSouth's arbitration Petition, US LEC also respectfully requests that the Authority consider this Motion at the TRA's next regularly scheduled public conference on February 15, 2000.

Respectfully submitted,



Henry Walker  
Boult, Cummings, Conners & Berry PLC  
414 Union Street, Suite 1600  
Nashville, Tennessee 37219  
(615) 252-2363

Counsel for US LEC of Tennessee Inc.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served via U.S. First Class Mail or Hand Delivery on the parties of record on this the 10<sup>th</sup> day of February, 2000.

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300

A handwritten signature in black ink, appearing to read "Guy Hicks", is written over a horizontal line.